

Heraeus Metal Processing, LLC Santa Fe Springs 15524 Carmenita Road Santa Fe Springs, CA 90670

Environmental Contact Name: Peter Eckert Phone: +1 / 562/483-1830 Fax: +1 / 562/623-3051 E-mail: peter.eckert@heraeus.com www.heraeus.com

Environmental Protection Agency
Office of Enforcement and Compliance Assurance
Office of Federal Activities
International Compliance Assurance Division (2254A)
Ariel Rios Building
1200 Pennsylvania Ave. NW
Washington, DC 20460

February 14, 2011

RE: Annual Report 2010 for export of excluded recyclable materials for Heraeus Metal Processing, LLC Wartburg TN TND 000 646 612

Please find enclosed a spreadsheet of excluded recyclable material exported to W.C. Heraeus GmbH in Germany.

Attached are also copies of the transfrontier notification letters as well as the competing agencies approvals.

If you have any questions, please call me at 562-483-1830 or e-mail me at peter.eckert@heraeus.com.

Best Regards

Peter Eckert

Manager Environmental

Attachments: Transfrontier Agreement US6612/0120009, US6612/122209

Cc: Director Division of Solid Waste Management

Tennessee Department of Environment and Conservation

Fifth Floor, L & C Tower 401 Church Street Nashville, TN 37243 From: (562) 483-1830 Peter Eckert

Heraeus Metal Processing, LLC 15524 Carmenita Road

Santa Fe Springs, CA 90670

Origin ID: JDYA



J11101012220225

SHIP TO: (202) 564-4127 BILL SENDER
Ms. Jean Shaw
EPA Int. Comp. Assurance Div.
Ariel Rios Bldg. RM6144
1200 Pennsylvania Ave. NW
Washington, DC 20004

Ship Date: 22FEB11 ActWgt: 0.5 LB CAD: 8637435/INET3130

Delivery Address Bar Code



Ref# Invoice# PO# Dept#

> WED - 23 FEB A1 STANDARD OVERNIGHT

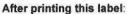
TRK# 0201 7944 5052 5554

20004 DC-US DCA





50DG1/82C2/7EFB



1. Use the 'Print' button on this page to print your label to your laser or inkjet printer.

2. Fold the printed page along the horizontal line.

3. Place label in shipping pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.

Warning: Use only the printed original label for shipping. Using a photocopy of this label for shipping purposes is fraudulent and could result in additional billing charges, along with the cancellation of your FedEx account number.

Use of this system constitutes your agreement to the service conditions in the current FedEx Service Guide, available on fedex.com.FedEx will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay, non-delivery,misdelivery,or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim.Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental,consequential, or special is limited to the greater of \$100 or the authorized declared value. Recovery cannot exceed actual documented loss.Maximum for items of extraordinary value is \$500, e.g. jewelry, precious metals, negotiable instruments and other items listed in our ServiceGuide. Written claims must be filed within strict time limits, see current FedEx Service Guide.

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Annual Report of Excluded Recyclable Material Export

Exporter:

Heraeus Metal Processing, LLC

1975 Knoxville Highway Wartburg, TN 37887 TND 000 646 612 Tel. (423) 346-8200 Fax (423) 346-8655

Calender Year: 2010

US6612/0120009

Consignee:

WC Heraeus GmbH

Heraeusstrasse 12-14

63450 Hanau Germany

Tel. (6181) 35 3152 Fax (6181) 35 9110

Hydro and Pyro-metallurgical smelting and refining

Transporter:

Freehold Cartage Inc. 108 Monahan Ave Dunmore, PA 18512 EPA ID# NJD054126164 Tel: 800-326-9238 Ext.225

Fax: 570-324-7367

Contact: Jonathan R. Penman

e-mail: jpenman@freeholdcartage.com

Air:

Lufthansa Cargo

ATL

South Cargo Complex

4301 Asr Road

Atlanta, Georgia 30337 Tel: (800)542-2746 Fax: 404-766-1646

- Shipping Name: UN3077, Environmentally hazardous substance, solid. n.o.s. (precious metal residues), 9, III
- Waste Code: EPA N/A
- Number of shipments, shipment date, weights and transfrontier number see table below.

Environmentally hazardous substance, solid	Generator Exporter	TSDF Consignee	Shipment Date	Gross Weight Ibs	# of Shipment	Trans-frontier #
UN3077, 9, III	HMP TN	W. C. Heraeus	2/10/2010	699	4	US6612/0120009

US6612/122209

Consignee:

WC Heraeus GmbH

Heraeusstrasse 12-14

63450 Hanau Germany

Tel. (6181) 35 3152 Fax (6181) 35 9110

Hydro and Pyro-metallurgical smelting and refining

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Fax: 570-324-7367

Contact: Jonathan R. Penman

e-mail: jpenman@freeholdcartage.com

Air:

Lufthansa Cargo

ATL

South Cargo Complex

4301 Asr Road

Atlanta, Georgia 30337 Tel: (800)542-2746 Fax: (404) 766-1646

Shipping Name: UN3077, Environmentally hazardous substance, solid. n.o.s. (precious metal residues), 9, III

Waste Code: EPA N/A

Number of shipments, shipment date, weights and transfrontier number see table below.

Environmentally hazardous substance, solid	Generator Exporter	TSDF Consignee	Shipment Date	Gross Weight Ibs	# of Shipment	Trans-frontier #			
UN3077, 9, III	HMP TN	W. C. Heraeus	5/7/2010	153	1				
UN3077, 9, III	HMP TN	W. C. Heraeus	10/27/201 0	1,544	2	US6612/12220 9			

Heraeus

-4-

Total lbs 2010	2,396	3

Waste minimization:

Heraeus is not considered a hazardous waste facility (Tennessee Department of Environment and Conservation Division of Solid/Hazardous Waste Management, 1200-1-11.02). Therefore, waste minimization requirements do not apply.

Certification:

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediate responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

Signature of Company Official

Curtis Mello
Printed Name of Company Official

VP Mgt. Systems & Compliance

Title

Notification document for transboundary movements/shipments of waste

Exporier - notifier Registration No: Name: Heraeus Metal Processing, L Address: 1975 Knoxville Highway	TND 000 646 612 LC		3. Notification I Notification co A.(i) Individual		0120009	Multiple ship	oments:	×		
Wartburg, TN 37887 USA			B.(i) Disposal	(1):	(ii)	Recovery:		×		
Contact person: Jan Kountz			C. Pre-cons	ented recovery fa	acility (2;3	The state of the s		No X		
Tel: 001-423-346-8200 Fax	c: 001-423-346-865	55	4. Total intende	ed number of sh	ipments:	24				
E-mail: Robert.smith@heraeus.com			5. Total intende	ed quantity (4):						
Importer - consignee Registration Normanne: W. C. Heraeus GmbH	o: F44V00020		Tonnes (Mg): m ³ :	200						
Address: Heraeusstrasse 12-14				iod of time for s						
DE 63450 Hanau Contact person: Siegmund Bost			First departure: 7. Packaging ty	01.03.200	-	ast departure	28	.02.2010		
Tel: 06181-35-4717 Fax:	06181-35-99341			ng requirements	<u>1</u> (6):	Yes: ×	C N	o: 🗆		
E-mail: Siegmund.bost@heraeus.com	n		11. Disposal / r	ecovery operati						
8. Intended carrier(s) Registration No: Name(7): See Annex			D-code / R-code							
Address:			Technology emp	mation of metal a	and metal	compounds				
Contact person:			Reason for expo	ort (1;6):		and the second				
ATTENDED TO THE PARTY OF THE PA	Fax:		Reclamation of	111111111111111111111111111111111111111		1 (0)	-			
E-mail: e.moemmertzheim@talke.com Means of transport (5): R, A, R	n		12. Designation	and compositi	on of the	waste (6):				
Waste generator(s) - producer(s) (1 Name: Heraeus Metal Processing, I Address: 1975 Knoxville Highway	Control of the Contro	TND000646612	Metal residues of reclamation	containing charac	cteristic m	etals for meta	l recovery	and		
Wartburg, TN 37887 USA Contact person: Annette Adkisson			13. Physical ch	aracteristics (5)):	1, 3, 4				
The state of the s	Fax: 001-423-346	6-8655	14. Waste ident	ification (fill in r	elevant co	odes)		ь		
E-mail: Annette.adkisson@heraeus		VIII (or IX if appli		A1020		¥.				
Site and process of generation (6) Her Residues of metals reclamation	(ii) OECD code (if different from (i)): (iii) EC list of wastes: 10 07 99 (iv) National code in country of export: Environmentally hazardous substance (v) National code in country of import: 10 07 99									
10. Disposal facility (2): Registration No: F44V00020										
Name: W. C. Heraeus GmbH			(vi) Other (specif		іроп.	10 07 99				
Address: Heraeusstrasse 12-14			(vii) Y-code:	-						
DE 63450 Hanau			(viii) H-code (5):							
Contact person: Siegmund Bost			(ix) UN class (5)							
Tel: 06181-35-4717 E-mail: Siegmund.bost@heraeus.c	Fax: 06181-35-9934	41	(x) UN Number: (xi) UN Shipping	3077	nmontally	hazardoue e	uhetanco	enlid		
	. Heraeus GmbH, Ha	nau	(xii) Customs co				ubotanico,	John		
15. (a) Countries/States concerned, (b)	Code no. of compete		e applicable, (c) S	pecific points of	exit or en	try (border cro	ossing or	oort)		
State of export - dispatch		State(s) of transit	(entry and exit)				of import -	destination		
(a) USA (b) 17-04		None				Germany DE010				
(c) Atlanta						Frankfurt	- 1			
16.Customs offices of entry and/or exi	t and/or export /Eur	opean Community	n:			Frankluit				
Entry: Customs office Frankfurt Airport		Customs office Atla		Expo	rt:					
17. Exporter's - notifier's / generator's cartify that the information is complete and	- producer's (1) dec	laration: HAUAVO	5199000300 BON	D AT COMMER	ZBANK (
entered into and that any applicable insu								umber of		
Exporter's - notifier's name: Herae	eus Metal Processing,			nature:	= 5		anne	xes attached		
Generator's - producer's name: Herae	eus Metal Processing,		THE RESERVE TO SERVE THE PARTY OF THE PARTY	nature.	-5	66-	2			
10 Asknowledness at from the set		OR USE BY COMP	-		merre	nt menulate d	hu tha			
 Acknowledgement from the relevant countries of import - destination / tran 			20. Written cons competent auth					010		
Country: Germany DEO.		10).	Consent given or	1: 28.4.70	509					
Notification received on: 26.3.09			Consent valid fro	m: 28.4. 20	2009	until: 2	28.02	2.2010		
Acknowledgement sent on: 30.3	05		Specific condition			Yes, see blo	ck 21 (6):			
Name of competent authority:			Name of compet			1	NG.	Pal		
Stamp and/or signature: Regierungspräsidium D	armstadt	armetadi	Stamp and/or sig	nature:		140	D C	77		
Abteilung Arbeitsschutz	und Umwell D	armstadt	. ,	0-	1	10	了一个	700 S		
64278 Darmstadt	. A . Sign	Nant	1	· sipon	ail	129	という	(美里		
21. Specific conditions on consenting	to the movement do	cument or reason	s for objecting	U		100	500	USI		
CA. Valle	Cours 1	dal-1 0	0 1 00			10.00	1			
	f consent	olated 2	8.4.09			TAN	94 7	1/		
See Celler o 1) Required by the Basel Convention 2) In the case of an R12/R13 or D13-D15 operation,	f consent		a	(5) See list of ab			94 77 A	0		

(4) Attach detailed list if multiple shipme (NV Da 42.1 100b 04.03(39) - 3 - 13/09 -

Heraeus

Heraeus Metal Processing, LLC Santa Fe Springs 13429 Alondra Blvd. Santa Fe Springs, CA 90670

Environmental & Security Contact Name: Peter Eckert Phone: +1 / 562/483-1830 Fax: +1 / 562/623-3051 E-mail: peter.eckert@heraeus.com www.heraeus.com

January 20, 2009

.....

VIA FEDEX

Ms. Jean Shaw
Environmental Protection Agency
Office of Enforcement and Compliance Assurance
Office of Federal Activities
International Compliance Assurance Division (2254A)
Ariel Rios Building
1200 Pennsylvania Ave. NW
Washington, DC 20460
Attention: OECD Export Notification

Subject: Renewal of OECD Export Notification

Heraeus Metal Processing, LLC hereby gives notice and consent of export to an OECD Country of an environmentally hazardous substance from its Wartburg, Tennessee facility to WC Heraeus GmbH (Hanau) Refiner, Germany. The material is a treated environmentally hazardous substance, solid, residue containing precious metals from our production process destined for reclamation of precious metal.

The following information is supplied per 40 CFR 262.83:

- Notification No: US 6612/012009
- Heraeus Metal Processing, LLC 1975 Knoxville Highway Wartburg, Tennessee 37887 USA EPA ID No. TND 000 646 612 Tel: 423-346-8200 Fax: 423-346-8655
- WC Heraeus GmbH
 Heraeusstrasse 12-14
 63450 Hanau
 Germany
 Tel. 06181-35-4717
 Fax 06181-35-9341
 Hydro and Pyro metallurgical smelting and refining
- Consignee: Mr. Bost WC Heraeus GmbH

- 2 -

Heraeusstrasse 12-14 63450 Hanau Germany Tel. (6181) 35-4717 Fax (6181) 35-9341

- Agent: Mr. Nick Lin ENL Global, Inc. 3420 Garfield Ave. City of Commerce, CA 90040 USA Tel. 323-201-5029 Fax 323-837-9888
- 6. USA, US Customs, Wartburg, TN to Atlanta, GA, airport: highway Atlanta, GA airport, to Frankfurt, Germany: air transport.
- 7. Containers: 55 gallon drums, plastic wrapped, strapped on treated pallets
- 8. No transit countries
- 9. Germany, German Customs, Frankfurt, Germany to Hanau, Germany: highway
- General Notification for 24 shipments, first shipment not before 3/01/09 and last departure not after 2/28/10
- 11. The commencement date for the transfrontier movement is 3/1/09
- Environmentally hazardous substance, solid, residues containing precious metal Amber list waste code: A 1020
 European Waste Catalog (EWC) code: 10 07 99
 Total estimated quantity 200,000 kg
- 13. I certify that the above information is complete and correct to the best of my knowledge. I also certify that the legally enforceable written contractual obligations have been entered into, and that applicable insurance or other financial guarantees are or shall be covering the transfrontier movement.

Name: Peter Eckert Signature: Par Fold Date: 1/27/08

If you need additional information on this matter, please call me direct at 562-483-1830 or e-mail me at peter.eckert@heraeus.com.

.../3

Sincerely,

Peter Eckert

Manager Environmental & Security

Poli Sent

CC:

Director Division of Solid Waste Management

Tennessee Department of Environment and Conservation

Fifth Floor, L & C Tower 401 Church Street Nashville, TN 37243

Ms. Müllemann

Regierungspräsidium Darmstadt

Wilhelminenstr. 1-3 64278 Darmstadt Germany

Attachment:

Transfrontier Movement of Waste US 6612/012009

Annex 1 & 2 for US 6612/102009

Exporter - notifier Registration Name: Heraeus Metal Proce	on No: TND 000 646 612 ssing, LLC		(F13)25 - 3 1000		n No: U		/12220	09	11011				5-07-10898-8
Address: 1975 Knoxville Highw	2 ACCOUNT				ual shipme		П	(ii)	Multiple	shipm	ents:	×	
Wartburg, TN 37887 USA				Dispos			$\bar{\Box}$	(ii)	Recover	38.55		×	
Contact person: Annette Adk	isson		C.		nsented re	covery	facility			22/09		No	×
Tei: 001-423-346-8200	Fax: 001-423-346-8655		4. Tot	-	ded numl	-		-	6			110	
E-mail: Annette.adkisson@he	eraeus.com		-		ided quan								
2. Importer - consignee Registr				s (Mg):		inty (4).							
Name: W. C. Heraeus GmbH	ľ		m³:	o (mg/									
Address: Heraeusstrasse 12-14	4		6. Inte	nded p	eriod of t	ime for	shipr	nent(6) (4):				
DE 63450 Hanau	0014		-	epartur		1.03.20	****	La	ast depart	ure:	2	8.02.20	011
Contact person: Siegmund Bo Tel: 06181-35-4717			7. Packaging type(s) (5): 1 Special handling requirements (6): Yes: × No:										_
E-mail: Siegmund.bost@hera					recovery				Yes:	×	F	lo:	
8. Intended carrier(s) Registrati		115 51-3			de (5):		nonta) (2)					
Name(7): See Annex	on red.		1000000		mployed (
Address:			CONTROLL N		CONTROL OF COLUMN	esta.		158					
			Recov	ery/Red	clamation of	of metal	and r	netal	compound	is			
Contact person:			Reaso	n for ex	port (1;6):								
Tel:	Fax:		Recla	mation	of metals								
E-mail: e.moemmertzheim@t			12. De	signati	ion and co	omposi	tion o	f the	waste (6)				
Means of transport (5): R, A,													
 Waste generator(s) - product Name: Heraeus Metal Procest Address: 1975 Knoxville High 	ssing, LLC	TND000646612	Metal reclar		s containir	ng chara	acteris	tic me	etals for m	etal re	ecove	ry and	
Wartburg, TN 37887 USA	iway		12 DI	welco!	characteri	ietice /	<i>E</i>).		1 2 4	_			
Contact person: Annette Adki	eson		13. PR	ysical	CharaGleri	isucs (oj.		1, 3, 4				
Tel: 001-423-346-8200	Fax: 001-423-346-8	655	14. W	aste ide	entification	n /fill in	releva	ent co	des)		_		
E-mail: Annette.adkisson@									A1020				
Site and process of generation (6) Heraeus Metal Processing, LLC			(i) Basel Annex VIII (or IX if applicable): A1020 (ii) OECD code (if different from (i)):										
Residues of metals reclamation			(iii) EC	list of v	wastes:	10 07	99						
0. Disposal facility (2): or recovery facility (2):				(iv) National code in country of export: Environmentally hazardous substance									
Registration No: F44V00020	WW.				ode in cour	ntry of i	mport:	•	0 07 99				
Name: W. C. Heraeus Gmb				her (spe	ecify):	0.00							
Address: Heraeusstrasse 12- DE 63450 Hanau	14		(vii) Y-		-1								
Contact person: Siegmund Bost				-code (H13							
Tel: 06181-35-4717	Fax: 06181-35-99341			Numbe		3077							
E-mail: Siegmund.bost@he					ng name:	PRODUCTION AND	ronme	ntally	hazardou	s suh	stance	solid	
Actual site of disposal/recovery:		u			code(s) (H					0 000	J.W. 151	, 00110	
15. (a) Countries/States concer										cross	sing or	port)	
State of export - dispatch		State(s) of transit (- desti	nation
a) USA	N	lone							Germany				
(b) 17-04							45.11		DE010				
(c) Atlanta									Frankfur	t			
6.Customs offices of entry and				1100									
ntry: Customs office Frankfurt		istoms office Atlar				Exp							
17. Exporter's - notifier's / gene													
certify that the information is comp entered into and that any applicat												Numbe	ar of
Exporter's - notifier's name:	Heraeus Metal Processing, L		1.2010		Signature:			all y	avenien.				ttached
Generator's - producer's name:	Heraeus Metal Processing, L		1.2010		Signature:		9	5			3	-100 0	
		USE BY COMPE		New York Street			aller for		UKAS ANAGARA		10		
19. Acknowledgement from the	relevant competent authority	of of	20. Wr	itten co	onsent (1;			/eme	nt provide	ed by	the		
countries of import - destination	n / transit /1) / export - dispat		compe	tent au	thority of	(count	ry):	60	K.M	AN	V4		
			Consent given on: 13.04.20010										
					from: 43	04	. 2						NOV
scknowledgement sent on: 46	03. 2010		Specifi	c condi	tions:	No:	1	_ 11	Yes, see	block	21 (6): 4	4
lame of competent authority:	risidium Dannstadt				etent auth		1)	E	OI	0		- 1	
Stamp and/or signature:	censionals and Umwe	III Darmstad	Stamp	and/or	signature:			2 100					
64278 Damis	stadt // ·	>1				14000	11	1.1	110		13	RA	SIM
	A. (M.)	10			. A	·	u	w	le	1	25	100	A 16
1. Specific conditions on cons	enting to the movement docu	ment or reasons	s for ot	jectino	the second second second	-				1	-	7	100
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266	tren consen	1								CX	PA	65	THE TO
) Required by the Basel Convention	49 1100h 04 03 /	30-3-81	10		(5) S	ee list of	abbrevi	ations a	ind codes on	the ne	xt page	100	de 24

⁽²⁾ In the case of an R12/R13 of M3 22 September, laiso electrocorresponding information on any subs R12/R13 or D13-D15 facilities and on the subsequent R1-R11 or D1-D12 facility) ies when required (3) To be completed for movements within the OECD area and only if B(ii) applies (4) Attach detailed list if multiple shipments

⁽⁶⁾ Attach details if necessary
(7) Attach list if more than one
(8) If required by national legislation
(9) If applicable under the OECD Decision



Heraeus Metal Processing, LLC Santa Fe Springs 15524 Carmenita Road Santa Fe Springs, CA 90670

Environmental
Contact Name: Peter Eckert
Phone: +1 / 562/483-1830
Fax: +1 / 562/623-3051
E-mail: peter.eckert@heraeus.com
www.heraeus.com

January 14, 2010

VIA FEDEX

Ms. Jean Shaw
Environmental Protection Agency
Office of Enforcement and Compliance Assurance
Office of Federal Activities
International Compliance Assurance Division (2254A)
Ariel Rios Building
1200 Pennsylvania Ave. NW
Washington, DC 20460
Attention: OECD Export Notification

Subject: Renewal of OECD Export Notification

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The following information is supplied per 40 CFR 262.83:

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- 3. WC Heraeus GmbH
 Heraeusstrasse 12-14
 63450 Hanau
 Germany
 Tel. 06181-35-4717
 Fax 06181-35-9341
 Hydro and Pyro metallurgical smelting and refining
- 4. Consignee: Mr. Bost WC Heraeus GmbH

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-2-

Heraeusstrasse 12-14 63450 Hanau Germany Tel. (6181) 35-4717 Fax (6181) 35-9341

- Agent: Mr. Nick Lin ENL Global, Inc. 3420 Garfield Ave. City of Commerce, CA 90040 USA Tel. 323-201-5029 Fax 323-837-9888
- 6. USA, US Customs, Wartburg, TN to Atlanta, GA, airport: highway Atlanta, GA airport, to Frankfurt, Germany: air transport.
- 7. Containers: 55 gallon drums, plastic wrapped, strapped on treated pallets
- 8. No transit countries
- 9. Germany, German Customs, Frankfurt, Germany to Hanau, Germany: highway
- 10. General Notification for 6 shipments, first shipment not before 3/01/10 and last departure not after 2/28/11
- 11. The commencement date for the transfrontier movement is 3/1/10
- Environmentally hazardous substance, solid, residues containing precious metal Amber list waste code: A 1020
 European Waste Catalog (EWC) code: 10 07 99
 Total estimated quantity 30,000 kg
- 13. I certify that the above information is complete and correct to the best of my knowledge. I also certify that the legally enforceable written contractual obligations have been entered into, and that applicable insurance or other financial guarantees are or shall be covering the transfrontier movement.

Name: Peter Eckert Signature: 120 - Date: 01/19/2016

If you need additional information on this matter, please call me direct at 562-483-1830 or e-mail me at peter.eckert@heraeus.com.

.../3

Sincerely,

Pag. Peter Eckert

Manager Environmental

CC:

Director Division of Solid Waste Management

Tennessee Department of Environment and Conservation

Fifth Floor, L & C Tower 401 Church Street Nashville, TN 37243

Ms. Müllemann

Regierungspräsidium Darmstadt

Wilhelminenstr. 1-3 64278 Darmstadt

Germany

Sof.

Attachment: Transfrontier Movement of Waste US 6612/122209

Annexes for US 6612/122209 Support Documentation